

UNITED STATES OF AMERICA  
UNITED STATES DISTRICT COURT  
FOR THE EASTERN COURT OF MICHIGAN

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SHARI L. OLIVER,  
Plaintiff,

No. 2: 24 – cv -12962  
Hon.: Gershwin A. Drain  
Mag. Judge Elizabeth A. Stafford

V.

PHILLIP G. VERA, AND  
MATTHEW W. OLIVER, ET AL.,  
Defendants.

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**DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR ENTRY  
OF DEFAULT JUDGMENT**

NOW COMES, Defendants, Phillip G. Vera and Matthew W. Oliver, by and through their attorneys, Advanta Law PLC, respectfully submit this Response to Plaintiff's Motion for Entry of Default Judgment, and state as follow:

1. This action essentially is a re-litigation by the same Plaintiff against almost identical Defendants.
2. Defendant Vera and Defendant Oliver were named in Plaintiff's 2022 lawsuit (Case No. 2:22-cv-12665).

3. Plaintiff is barred from re-litigating the same claims under *res judicata* and *collateral estoppel*.
4. The federal claims asserted in case No. 2:22-cv-12665 were dismissed with prejudice.
5. Plaintiff's federal claims in the current complaint are almost identical to the claims that were asserted against Defendant Vera and Defendant Oliver in the Plaintiff's 2022 complaint.
6. The current complaint suggests Plaintiff is dissatisfied with the previous court outcome.
7. Plaintiff's current complaint lacks merit.
8. Plaintiff is not entitled to a judgment as a matter of law.
9. On March 20, 2025, the Defendants filed a Motion to Set Aside Clerk's Entry of Default. (ECF. # 86)
10. Defendants Oliver and Vera seek the Court's approval of the Motion to Set Aside the Entry of Default.
11. If the Court grants the Motion, Plaintiff's Motion for Default Judgment would be moot.
12. If the Motion is denied, Defendants request leave to amend their Response to Plaintiff's Motion for Default Judgment.

WHEREFORE, the Defendants pray for this Honorable Court deny Plaintiff's Motion for Entry of Default Judgment.

Dated: March 21, 2025

Respectfully Submitted,

**ADVANTA LAW PLC**

/s/ Alia A. Sareini

Alia A. Sareini (P86710)  
Mohamed J. Zaher (P52020)  
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Oliver  
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**BRIEF IN SUPPORT**

NOW COMES, Defendants, Phillip G. Vera and Matthew W. Oliver, by and through their attorneys, Advanta Law PLC, respectfully submit this Brief in Response to Plaintiff's Motion for Entry of Default Judgment, states as follow:

1. Defendants rely on the applicable federal rules of civil procedure and the local court rules for the Eastern District of Michigan.

Respectfully Submitted,

Dated: March 21, 2025

**ADVANTA LAW PLC**

/s/ Alia A. Sareini

Alia A. Sareini (P86710)

Mohamed J. Zaher (P52020)

Attorneys for Defendants Vera and  
Oliver

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 21, 2025, I filed the forgoing with the Clerk of the Court by using CM/ECF filing and that an electronic notice filing and copy of the foregoing will automatically be sent to all parties of record.

I declare under the penalty of perjury that the foregoing statement is true to the best of my information, knowledge and belief.

\_\_\_\_\_/s/ Alia Sareini\_\_\_\_\_  
Alia Sareini